

# EXHIBIT C

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**DEFENDANT HTC CORPORATION'S OBJECTIONS TO  
PLAINTIFF'S UPDATED TRIAL WITNESS LIST**

Defendant HTC Corporation (“Defendant”) hereby submits the following objections to Plaintiff’s updated trial witness list pursuant to Federal Rule of Civil Procedure 26(a)(3)(A) and the Eighth Amended Docket Control Order (D.I. 212). Defendant reserves the right to modify, amend or supplement these objections throughout the balance of this case. Defendants also reserve the right to supplement or modify these objections in response to rulings by the Court (including on any motions).

Defendant objects to Plaintiff’s identification of 14 “will call” witnesses and 5 “may call” witnesses as failing to give Defendant fair notice of the witnesses that the Plaintiff expects to present at trial and prejudicing Defendant’s ability to prepare for trial. Defendant also specifically objects to the following witnesses:

1. Luis Molero-Castro: Defendant objects to Plaintiff’s identification of this witness because Plaintiff controls this witness and refused to bring the witness to the U.S. for deposition by Defendant, but now plans to bring him to trial.
2. Ho Chia Chu: Defendant objects to Plaintiff’s identification of this witness “by deposition” because Plaintiff has not designated any deposition testimony for this witness.
3. John M. DiMatteo: Defendant objects to Plaintiff’s identification of this witness under F.R.E. 401 and 403 because this witness is not relevant to the disputed issues and/or the probative value of this witness’ testimony, if any, is outweighed by the dangers of unfair prejudice and confusion to the jury.
4. Howard Lee: Defendant objects to Plaintiff’s identification of this witness under F.R.C.P. 26(a)(1) for failure to identify this witness on its initial disclosures and Rule 45(c)(1).
5. Jason Lee: Defendant objects to Plaintiff’s identification of this witness under F.R.C.P. 26(a)(1) for failure to identify this witness on its initial disclosures and Rule 45(c)(1).

6. Robert L. Meyers: Defendant objects to Plaintiff's identification of this witness "by deposition" because Plaintiff has not designated any deposition testimony for this witness.
7. Sivasubramanian Muthukumarasamy: Defendant objects to Plaintiff's identification of this witness "by deposition" because Plaintiff has not designated any deposition testimony for this witness.
8. Joseph Sofer: Defendant objects to Plaintiff's identification of this witness under F.R.E. 401 and 403 because this witness is not relevant to the disputed issues and/or the probative value of this witness' testimony, if any, is outweighed by the dangers of unfair prejudice and confusion to the jury.
9. Tung Shan Wei: Defendant objects to Plaintiff's identification of this witness "by deposition" because Plaintiff has not designated any deposition testimony for this witness.

Defendant reserves the right to withdraw these objections.